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Application GRANTED. Letter due November 19, 2020
by 2:00 p.m.

E-mail Address
Brooke.Cucinella@stblaw.com

BY ECF

11/18/2020

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

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The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *United States v. Ray*, 20 Cr. 110 (LJL) (S.D.N.Y.)

Dear Judge Liman:

I was recently appointed CJA counsel representing the victim referenced in paragraphs 6 through 11 in the letter dated November 5 and filed by defense counsel on November 9, *see* Dkt. No. 97, relating to the ongoing dispute about certain subpoenas that appear to have been issued seeking my client's personal and confidential information and certain records which we believe contain privileged information. My client strenuously objects to the subpoenas issued pursuant to Rule 17(c)(3) and the production of her personal, confidential information, and in no way intends to waive or otherwise forfeit her privilege over any of the materials sought by the defense.

Accordingly, I respectfully request leave to intervene to protect my client's interests in this proceeding. Should this request be granted, I further respectfully request that my client be permitted to (i) join the Motion to Quash filed on behalf of Mr. LaVerne's client, *see* Dkt. Nos. 78, 84; and (ii) file a short letter in advance of oral argument, which we understand is scheduled for November 20, to make the Court aware of certain factual issues unique to my client.

Thank you for your consideration.

Respectfully submitted,

/s/ Brooke Cucinella

Brooke Cucinella

cc: Counsel of record (by ECF)